

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

_____	)	
ROBERT P. GOODRICH,	)	
	)	
Petitioner,	)	
	)	
v.	)	Civil Action No. 03-12541-NG
	)	
TIM HALL,	)	
	)	
Respondent.	)	
_____	)	

**PETITIONER'S MOTION FOR ENLARGEMENT OF TIME  
TO FILE OPPOSITION TO RESPONDENT'S MOTION TO DISMISS  
(ASSENTED-TO)**

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Petitioner Robert P. Goodrich (Petitioner) hereby moves that the Court enlarge the time for filing his Opposition to Respondent Tim Hall's Motion to Dismiss (Respondent) fourteen (14) days, to and including April 8, 2004. As grounds therefor, Petitioner states that the Commonwealth has presented numerous procedural defenses to Petitioner's Petition For Writ of Habeas Corpus under 28 U.S.C. §2254. Petitioner, who presently seeks relief from a minimum ten-year sentence, requests that this Court provide him with additional time to comprehensively research his arguments and defenses to the Commonwealth's motion. In further support of this motion, the Commonwealth has assented to the requested enlargement of time.

Respectfully submitted,

ROBERT P. GOODRICH,

By his attorneys,

/s/ Jill L. Brenner  
Peter E. Gelhaar (BBO# 188310)  
Jill L. Brenner (BBO# 652501)  
Donnelly, Conroy & Gelhaar, LLP  
One Beacon Street, 33<sup>rd</sup> Floor  
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Dated: March 19, 2004

**LOCAL RULE 7.1 CERTIFICATION**

I hereby certify that on March 18, 2004, I did confer in good faith, via telephone, with Maura D. McLaughlin, Esq., counsel for Respondent, in an effort to narrow or resolve the issues raised in this motion.

/s/  
Jill L. Brenner